

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

MIDAS GREEN TECHNOLOGIES, LLC, §  
§  
Plaintiff, §  
§  
v. § CIVIL ACTION NO. 6:24-CV-166-  
§ ADA  
GREEN REVOLUTION COOLING, INC., §  
§  
Defendant. §

**DECLARATION OF ASHLEY N. MOORE IN SUPPORT OF DEFENDANT GREEN  
REVOLUTION COOLING, INC.'S OPPOSED MOTION TO STAY PENDING  
INTER PARTES REVIEW OF THE '457 PATENT**

I, Ashley N. Moore, hereby declare as follows:

1. I am an attorney at law duly licensed to practice law in the State of Texas, admitted to the United States District Court for the Western District of Texas, and am a shareholder of the law firm of Greenberg Traurig, LLP, attorneys of record for Green Revolution Cooling, Inc. (“GRC”) in the above entitled action, and make this declaration in support of GRC’s Opposed Motion to Stay Pending *Inter Partes* Review of the ’457 Patent. Unless otherwise stated, I have personal knowledge of the facts set forth in this declaration, and if called as a witness, could and would competently testify as set forth below.

2. Attached hereto as Exhibit 1 is a true and correct copy of the *inter partes* review petition (IPR2025-00196) GRC filed on November 19, 2024, with the Patent Trial and Appeal Board to address the validity of claims 1-16 of U.S. Patent No. 10,405,457.

3. Attached hereto as Exhibit 2 is a true and correct copy of the United States Patent and Trademark Office, Patent Trial and Appeal Board Trial Statistics, FY24 End of Year Outcome Roundup, available at [https://www.uspto.gov/sites/default/files/documents/ptab\\_aia\\_fy2024\\_roundup.pdf](https://www.uspto.gov/sites/default/files/documents/ptab_aia_fy2024_roundup.pdf).

4. Attached hereto as Exhibit 3 is a true and correct copy of GRC’s November 19, 2024, stipulation regarding scope of estoppel provided in 35 U.S.C. § 315(e)(2) related to IPR2025-00196.

Dated: December 13, 2024

/s/ Ashley N. Moore  
Ashley N. Moore